

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS

	)	
In re	)	
	)	
CONNOLLY GEANEY ABLITT	)	Chapter 7
& WILLARD, PC,	)	Case No. 14-14164-JNF
	)	
Debtor.	)	
	)	

**ASSENTED-TO MOTION OF THE CHAPTER 7 TRUSTEE TO FURTHER  
ENLARGE TIME WITHIN WHICH TO RESPOND TO MOTION FOR  
RELIEF FROM THE AUTOMATIC STAY FILED BY DEBORAH LEWIS**

Stewart F. Grossman, Chapter 7 Trustee (the "Trustee") of the above-captioned estate, hereby moves to extend further the deadline by which he may file a response to the Motion for Relief from the Automatic Stay (pleading no. 49 filed October 16, 2014) (the "Motion") filed by Deborah Lewis ("Lewis") seeking document production directed at the debtor Connolly Geaney Ablitt & Willard, PC (the "Debtor"). By order dated November 6, 2014, this Court extended such deadline to November 14, 2014. The Trustee seeks to extend the response deadline to November 25, 2014. The basis for this requested extension is that the Trustee continues to review the boxes of documents and computer servers of the Debtor and needs additional time to discuss with counsel for Lewis his ability to locate documents.

Lewis assents to the extension requested herein.

WHEREFORE, the Trustee respectfully requests that this Court enter an order:

1. Extending the deadline by which the Trustee may file a response to the Motion to November 25, 2014; and

2. Granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

STEWART F. GROSSMAN,  
CHAPTER 7 TRUSTEE,

By his attorneys,

/s/ Adam J. Ruttenberg

Pamela A. Harbeson BBO #561479  
Adam J. Ruttenberg, BBO #553158  
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Dated: November 13, 2014

**CERTIFICATE OF SERVICE**

I, Adam J. Ruttenberg, hereby certify that on November 13, 2014, a true copy of **Assented-to Motion of the Chapter 7 Trustee to Further Enlarge Time Within Which to Respond to Motion for Relief from the Automatic Stay Filed by Deborah Lewis** was served via United States first class mail, postage prepaid, to each of the persons listed below:

Connolly, Geaney, Ablitt & Willard, PC  
304 Cambridge Road  
Woburn, MA 01801

Robert A. Cox  
Bank of America Corp. Center  
100 North Tryon Street, Suite 2690  
Charlotte, NC 28202

Petite Etoile Corporation  
Summit Title Corporation  
6 Ramsdell Way  
Lynnfield, MA 01940

Craig R. Jalbert  
Verdolino & Lowey, P.C.  
124 Washington Street  
Foxboro, MA 02035

The undersigned understands that the following received e-mail notices of this filing:

- Steven A. Ablitt    sablitt@brooksdecker.com
- Jeffrey D. Adams    jeffrey.adams@morganlewis.com
- Charles A. Dale    chad.dale@klgates.com, bobankruptcyecf@klgates.com
- Bertin C. Emmons    bemmons@sovereignbank.com
- John Fitzgerald    USTPRegion01.BO.ECF@USDOJ.GOV
- Wayne E. George    wgeorge@morganlewis.com
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/s/ Adam J. Ruttenberg  
Adam J. Ruttenberg

4812-7196-6752, v. 1